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May 22, 1989

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General Counsel
Federal Election Commission
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Washington, D.C. 20463

Attn: Jonathan Levin, Esq.

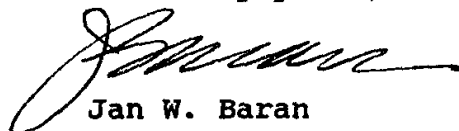
Re: MUR 2314 (National Republican
Senatorial Committee, et. al.)

Dear Mr. Noble:

This response is submitted on behalf of the National Republican Senatorial Committee (the "NRSC"), in reply to interrogatories and requests for documents propounded by the Federal Election Commission (the "Commission"), to the NRSC by letter of February 3, 1989.

Enclosed are the sworn answers to these interrogatories and requests, with attached documents.

Sincerely yours,



Jan W. Baran



Trevor Potter

Counsel for the National
Republican Senatorial Committee

Enclosure

cc: William Canfield, Esq.

**RESPONSE OF THE NATIONAL REPUBLICAN
SENATORIAL COMMITTEE TO THE INTERROGATORIES
AND REQUEST FOR DOCUMENTS IN
FEDERAL ELECTION COMMISSION MUR 2314**

QUESTION 1

State the total costs for solicitations for contributions to the Direct-To Program for the Santini campaign.

RESPONSE 1

As the National Republican Senatorial Committee ("NRSC") has explained in its earlier Responses in this MUR, the Direct-To Program was designed to enable some persons who had already responded to general NRSC fund-raising solicitations to instead designate their contributions directly to Senate candidates of the NRSC contributor's choice. The solicitation costs for the Direct-To Program began at the point that a contributor's general NRSC contribution was placed into a segregated fund, and an attempt was made to solicit the contributor in person on behalf of a specific candidate or candidates. The exception to this procedure was the Direct-To Auto Program, where the FEC allocation of solicitation costs began with a candidate-specific NRSC mailing, and accordingly did not involve a redesignation program.

Thus, the Direct-To Program (except for the Direct-To Auto Program) was not designed to solicit the public through NRSC mailings, but rather only to solicit persons who had already responded to a NRSC mailing. In each instance, the costs of contacts with individuals to request contributions for specific Senate candidates was allocated to those candidates. The cost of such contacts, and other Direct-To Program procedures, was \$16,026 for the Santini campaign, excluding the costs of mailings dealt with separately in Matter Under Review 2282.

QUESTIONS 1a and 1b

- a. Break down this total into solicitation costs for each of the five operations of the Direct-To Program, i.e., Direct-To, Direct-To Auto, Miscellaneous Conduiting, The Trust Program, and Majority '86.
- b. State how the figures in 1a were computed or allocated to the Santini Committee. Your answer should include, but not be limited to, the allocable costs for setting up and administering the Direct-To Program (e.g., payments to Arthur Andersen for services referred to on pp. 251-252 of the attachments to your September 22, 1987, response and the costs of procedures described on p. 298 of the attachments), the allocable costs of general solicitations made in contemplation of follow-up phone and/or mail solicitations asking for redesignation, the costs of such specific mailings or solicitations (including the services of those involved), and the costs of follow-up mailings and phone calls.

RESPONSES 1a and 1b

The solicitation costs charged to the Santini campaign for each of these programs was as follows:

	<u>Number of Contributions</u>	<u>Total Charged</u>
Direct-To	2466	\$7,398
Direct-To Auto*	2213	6,639
Miscellaneous Conduiting	451	1,353
Trust	122	366
Majority '86	90	270

The costs of soliciting and transmitting these contributions was allocated to the Santini campaign (and to other campaigns) at a flat charge of \$3.00 per contribution, as explained to the Federal Election Commission ("Commission") in the Response of the NRSC, et al. in MUR 2314 of March 10, 1987 [hereinafter "March 10, 1987 Response"] at Exhibit 1 (Affidavit of Maryanne

* The principal solicitation costs for Direct-To Auto have already been the subject of a conciliation agreement between the NRSC and the Federal Election Commission in Matter Under Review 2282, such agreement dated December 29, 1988 by the General Counsel of the FEC. This MUR is now closed. Costs for other NRSC Direct-To Auto mailings which resulted in funds being directed to the Santini campaign were allocated to, and paid for by, that Campaign, on the basis of \$3 per contribution received. The records available to the NRSC indicate that the Santini campaign was charged a total of \$6,639 for these contributions.

E. Preztunik). This was pursuant to the advice of provided by outside accounting firms as detailed in the NRSC's Response of March 10, 1987, at Exhibit 1 (Affidavit of Maryanne E. Preztunik).

QUESTION 2a

For the Direct-To operation, state:

The total cost of the general solicitations or fund-raising appeals referred to on p. 1 of your September 22, 1987, response to the Commission, and how this cost was computed or otherwise determined;

RESPONSE 2a

The total costs of general NRSC fund-raising solicitations referred to in the September 22, 1987 Response was \$1,951,093. This figure represents the cost to the NRSC of the services of vendors, including but not limited to printing and mailing costs, as determined by available NRSC records. This figure is not, however, the cost for solicitations "for the Direct-To operation," as the question implies, but rather represents the cost of the NRSC's own general solicitations, which occurred prior to any Direct-To Program solicitations.

QUESTION 2b

The number and total dollar amount of contributions received from these general solicitations;

RESPONSE 2b

\$6,947.872 was raised by the NRSC from 145,948 contributions in response to these solicitations.

QUESTION 2c

The number and total dollar amount of contributions from these general solicitations that were redesignated to candidates;

RESPONSE 2c

The 1985 and 1986 FEC reports indicate that roughly 16,000 of these NRSC contributors were solicited on behalf of specific candidate(s), resulting in a redesignation of \$1,082,160.

QUESTION 2d

The number and total dollar amount of contributions that were redesignated for the Santini campaign;

RESPONSE 2d

The NRSC's 1986 FEC Reports indicate that the Santini campaign received \$71,627 from individual NRSC contributors as a result of the Direct-To Program. This represents 2,466 contributions.

QUESTION 2e

The number and costs of phone solicitations asking for redesignation for specific candidates, and how such costs were computed or otherwise determined;

RESPONSE 2e

The total costs of the telephone designation program (which involved the use of NRSC telephones and personnel) was not separately computed by the NRSC. However, this would have been a cost factor in the calculations undertaken by the two outside accounting firms in determining the allocable cost to each campaign of Direct-To contributions, as explained in the response to Question One, herein.

QUESTION 2f

The different types of phone scripts used for soliciting contributions to specific candidates by candidates or states referred to, and the number of times the specific script was used or the specific letter was sent, e.g., Abdnor, Hawkins, Santini, Moore - 1,000 phone solicitations; and

RESPONSE 2f

Only one script was used throughout the Direct-To Program, and this has been submitted to the FEC in the Response of March 10, 1987 at Exhibit 3. There is no record of how many times specific candidates were mentioned by NRSC callers.

QUESTION 2g

The costs of the letters and verification forms sent to those designating Santini and any remaining expenses attributable to the Santini campaign after candidate designation, and how such costs were composed or otherwise determined.

RESPONSE 2g

The only information available to the NRSC on the cost of the letters and verification forms designating the Santini campaign has already been given to the FEC in the NRSC's earlier responses, specifically in the Affidavit of Maryanne E. Preztunik at Exhibit 1 of the Response of March 10, 1987, which details the advice of the two outside accounting firms which established the \$3.00 per contributor charge to cover these costs.

QUESTION 3a

For the Direct-To Auto operation, state:

The number and total costs of the solicitations requesting an earmarked contribution for one specific candidate, referred, to on p. 3 of your September 22, 1987, response, and how this cost was computed or otherwise determined;

RESPONSE 3a

Such solicitations were sent to 418,523 names at a total cost of \$191,877.00. This figure represents the cost to the NRSC of the services of vendors, including, but not limited to, printing and mailing costs, as determined by available NRSC records.

QUESTION 3b

The number of the solicitations described in 3a requesting an earmarked contribution for the Santini campaign and how this cost was computed or otherwise determined:

RESPONSE 3b

106,981 names received a solicitation requesting an earmarked contribution to the Santini campaign, and the total cost of this solicitation was determined as described at the answer to 3(a), above.

QUESTION 3c

The number and total dollar amount of the contributions received in response to the solicitations described in 3a;

RESPONSE 3c

10,266 contributions totalling \$297,288 were received in response to these solicitations.

QUESTION 3d

The number and total dollar amount of the contributions designated for the Santini campaign received in response to the solicitations described in 3a;

RESPONSE 3d

2,213 contributions totalling \$72,055 designated for the Santini Campaign were received in response to this solicitation.

QUESTION 3e

Whether the \$672,000 figure submitted by you as the cost of the September 2, 1986 mailing includes the cost of letters mailed referring to The Fund for America's Future (discussed on pp. 299-315 of the attachments to your September 22, 1987, response) and the reasons for any non-inclusion.

RESPONSE 3e

The "September 2, 1986 mailing" was to NRSC lists and to lists belonging to the Fund for America's Future. The \$672,000 figure is a total cost for mailing to all lists, and does include the letters mailed to the Fund for America's Future list.

QUESTION 4a

For the Trust Program, state the following:

The total cost of any and all general solicitations or fund-raising appeals which were mailed or made at a meeting or by telephone in anticipation of having Trust Program members designate candidates to receive contributions, and how this cost was computed or otherwise determined;

RESPONSE 4a

The NRSC has no record of any specific costs for these appeals. This is because the Trust has a strictly limited number of members, and low annual turnover. Members usually renew their annual membership upon telephonic or personal reminder. Contact with Trust members is usually on a personal basis, often at regularly scheduled Trust briefing meetings.

QUESTION 4b

The number and total dollar amounts of contributions resulting from the general solicitations or appeals referred to in 4a;

RESPONSE 4b

The Trust raised \$4,008,312 from 1/1/85 to 12/31/86,
from an unknown number of contributors.

QUESTION 4c

The number and total dollar amounts of contributions
resulting from the general solicitations or appeals
referred to in 4a that were designated for specific
candidates;

RESPONSE 4c

\$2,003,712 was designated for specific candidates, from
an unknown number of contributors.

QUESTION 4d

The number and total dollar amount of contributions
resulting from the general solicitations or appeals
referred to in 4a that were designated for the Santini
campaign;

RESPONSE 4d

The Santini Campaign received \$113,475 from contributors
to the Trust Program. This represents 122
contributions.

QUESTION 4e

The total cost of mailing, meetings, and telephone
solicitations where specific candidates were listed or
enumerated as potential recipients of contributions, and
how this cost was computed or otherwise determined;

RESPONSE 4e

The NRSC has no record of total costs for these Trust activities, as explained in the Response to Question 4a, above. However, the costs associated with directing funds to specific candidates was designed to be covered by the Trust's \$3 per contribution fee to each candidate.

QUESTION 4f

The different types of phone scripts and letters used for soliciting contributions to specific candidates by candidates or states referred to and the number the times the specific script was used or the specific letter was sent,

e.g., Abdnor, Hawkins, Santini, Moore - 1,000 phone solicitations
SD, FL, NV, LA - 1,000 letters mailed; and

RESPONSE 4f

The available NRSC records contain no such script, and to the best of my knowledge calls to Trust members did not follow any particular script.

QUESTION 4g

The total costs of letters and other verification correspondence sent to those designating the Santini campaign and any remaining expenses attributable to the Santini campaign after candidate designation, and how such costs were computed or otherwise determined.

RESPONSE 4g

The only information available to the NRSC on the cost of the letters and verification forms for the Trust Program designating the Santini Campaign has already

been given to the FEC in the NRSC's earlier responses, specifically in the Affidavit of Maryanne E. Preztunik at Exhibit 1 of the Response of March 10, 1987, which details the advice of the two outside accounting firms which established the \$3.00 per contributor charge to cover these costs.

QUESTION 5a

For the Majority '86 operation, state:

The number and total cost of the solicitations to individual and PACs requesting \$5,000 or more referred to on pages 4 and 5 of your September 22, 1987, response and how this cost was computed or otherwise determined;

RESPONSE 5a

The NRSC does not have records of the number and total cost of all of the solicitations to individuals and PACs requesting \$5,000 or more referred to on pages 4 and 5 of the September 22, 1987 Response, because these solicitations may have included telephone and personal contacts with Majority '86 members and prospects, for which records are not available. However, our records do indicate that the mail portion of the Majority '86 solicitations involved 178,003 individuals and PACs, at a total cost of \$414,172. This figure represents the cost to the NRSC of the services of vendors, and of in-house stationery and mailing costs.

QUESTION 5b

The number and total dollar amount of contributions received from the solicitations referred to in 5a;

RESPONSE 5b

\$1,848,382 was contributed to the Majority '86 program by an unknown number of contributors. This represents all contributions through the Majority '86 program, not just those from the mail solicitations identified in the Response to Question 5a, above.

QUESTION 5c

The number and total dollar amount of contributions received from the solicitations referred to in 5a that were designated for candidates;

RESPONSE 5c

\$1,201,419 (representing an unknown number of contributions) was designated for candidates through the Majority '86 program.

QUESTION 5d

The number and total dollar amount of contributions received from the solicitations referred to in 5a that were designated for the Santini campaign, prior to follow-up phone calls;

RESPONSE 5d

The Santini Campaign received \$75,575 in designated contributions through this program, from 90 contributors. Available NRSC records provide no breakdown of before and after telephone call totals.

QUESTION 5e

The different types of communications (referred to in 5a) used for soliciting contributions by candidates or states referred to, or, if a general solicitation, a description to that effect, and the number of times the specific letter was sent or the specific script was used (refer to question 4f for a description of the format of your response);

RESPONSE 5e

The NRSC sent 16 communications soliciting contributions. Of these, 10 were general mailings seeking contributions to the NRSC for its operations, while 6 other mailings were candidate specific and mentioned particular candidates involved in close Senate races.

QUESTION 5f

The total cost of the follow-up phone calls to Inner Circle donors referred to on p. 5 of your September 22, 1987, response, and how this cost was computed or otherwise determined;

RESPONSE 5f

The NRSC did not maintain this information.

QUESTION 5g

The number and total amount of contributions with respect to which the phone calls referred to in 5f were made;

RESPONSE 5g

The NRSC did not maintain this information.

QUESTION 5h

The number and total amount of contributions that were designated for specific candidates as a result of the phone calls referred to in 5f;

RESPONSE 5h

The NRSC did not maintain this information.

QUESTION 5i

The number and total amount of contributions that were designated for the Santini campaign as a result of the phone calls referred to in 5f;

RESPONSE 5i

The NRSC did not maintain this information.

QUESTION 5j

The different types of phone scripts used for soliciting contributions to specific candidates by the candidates or states referred to, and the number of times each script was used (refer to question 2f for a description of the format of your response); and

RESPONSE 5j

The available NRSC records contain no such scripts or records of their usage. Further, to the best of my knowledge, calls to Majority '86 members did not follow any particular script.

QUESTION 5k

The total costs of letters and other verification correspondence sent to those designating the Santini campaign after candidate designation, and how such costs were computed or otherwise determined.

RESPONSE 5k

See answer to 2(g), supra.

QUESTION 6

In connection with Miscellaneous Conduiting operation, you state that the NRSC received solicited and unsolicited earmarked contributions for forwarding to particular candidates and that there were no specific written solicitations for these programs. Using questions 2-5 as a guideline, e.g. questions on allocable costs of general solicitations and phone solicitations, state the costs attributable for the Santini campaign.

RESPONSE 6

The Santini campaign was charged \$3.00 per contribution for any and all miscellaneous conduiting contributions received, pursuant to the policy of the NRSC based upon the more complex Direct-To costs allocated by the two outside accounting firms explained by Maryanne E. Preztunik in her Affidavit at Exhibit 1 of the March 10, 1987 Response.

QUESTION 7a

With respect to the payments by the Santini Committee for the solicitation costs of the Direct-To Program, state:

the amount of payments made by the Santini

Committee to the NRSC in the form of direct payments;

RESPONSE 7a

As noted in the Response to Question One, supra, the Santini campaign paid \$16,026 to the NRSC for this purpose, excluding the costs associated with the mailings that were the subject of the Conciliation Agreement in MUR 2282.

QUESTION 7b

With respect to the payments by the Santini Committee for the solicitation costs of the Direct-To Program, state:

the amount in coordinated expenditures attributed to the solicitation costs;

RESPONSE 7b

No coordinated expenditures were attributed to these costs for the Santini campaign, because the Santini campaign was billed directly by the NRSC for these costs, and paid for them from Santini campaign funds.

QUESTION 7c

With respect to the payments by the Santini Committee for the solicitation costs of the Direct-To Program, state:

the entries in the NRSC reports for each of these payments or coordinated expenditures (by report, page number, and amount).

RESPONSE 7c

The NRSC currently has no retained copies of its 1986 FEC Reports. However, this information should be contained on line 12 of the NRSC's 1986 FEC Reports.

QUESTION 8

With respect to the Majority '86 operation, p. 5 of your September 22, 1987, response and documents enclosed with that response starting at p. 363 indicate that the NRSC would credit a contributor's \$1,000 1986 Inner Circle dues to a Majority '86 membership and then that Inner Circle member could commit \$1,000 each to four candidates to become a Majority '86 member. Then, the NRSC would phone the contributor and ask for a designation of the \$1,000 for a specific candidate.

RESPONSE 8

The NRSC's Majority '86 program sought to raise contributions of an initial \$1,000 for the NRSC's own operation accounts, and an additional \$4,000 in pledges to Senate campaigns. Accordingly, if an Inner Circle donor chose to redesignate a \$1,000 Inner Circle contribution as an initial Majority '86 membership

contribution, this \$1,000 initial NRSC contribution remained with the NRSC, and did not go to any candidate. No contributor was asked to redesignate that \$1,000 initial Majority '86 contribution to a Senate candidate. Accordingly, to the extent that Question Eight presupposes that Inner Circle \$1,000 contributions redesignated to Majority '86 were thereafter redesignated to specific candidates through a later NRSC telephone solicitation, that is incorrect.

QUESTION 8a

Prior to the making of the initial \$1,000 contributions, state whether the NRSC informed the Inner Circle donors referred to above that it would subsequently contact them to redesignate the initial \$1,000 contributions. If so, state how this was done (including references to specific documents and the language used).

RESPONSE 8a

No, the NRSC did not inform Inner Circle donors that it might re-contact them to ask them to redesignate their contributions as Majority '86 membership fees.

QUESTION 8b

State the contribution amount transmitted to the Santini campaign via NRSC check that resulted from the redesignation of the initial \$1,000 Inner Circle contributions referred to above.

RESPONSE 8b

As explained above, no Inner Circle contributions redesignated as Majority '86 initial \$1,000 membership fees were transmitted to the Santini campaign, or to any other Senate candidate.

QUESTION 9

State the information given to the Santini Committee by NRSC personnel with respect to the conduct of the Direct-To Program and with respect to the conduct of each of the five operations of the Direct-To Program. Such information should include, but not be limited to:

- a. information as to the existence, contents, and meaning of the Direct-To Program Agreement between the NRSC and the Santini campaign, e.g., the meaning of the phrase "the NRSC's masterfile" and the meaning of the phrase "direct fund-raising costs associated with a particular mailing or event" (as opposed to other solicitation costs of the program not associated with a particular mailing or event);
- b. information as to the types of NRSC solicitations made, e.g., general solicitations by mail, phone, or at meetings, solicitations asking for the designation by the original contributor of specific candidates (by name or state), and phone solicitations to contributors who had already made contributions asking for designation of specific candidates;
- c. information as to the frequency and extent of the types of solicitations discussed in response to 9a, e.g., when and how often such solicitations occurred and the number of persons solicited by the NRSC for contributions to Republican Senatorial campaigns and the Santini campaign;
- d. information as to how solicitations were conducted with respect to each of the five operations of the Direct-To Program;

- e. information as to how contributions were to be passed on to campaigns, i.e., either in the form of contributor checks or in the form of NRSC checks cut after redesignation; and
- f. information as to the types of costs (e.g., mailing, telephone, travel, computer, labor, costs of setting up the program, costs of general solicitations) and the extent of costs (including amounts ultimately paid or unpaid by the Santini Committee) incurred by the NRSC for the solicitation program.

RESPONSE 9

Most of the information given to the Santini Committee with respect to the Direct-To Program and its five associated operations was contained in Attachments 3 and 4 of the NRSC's previous Response of September 22, 1987. Additionally, the Santini Committee would have been billed on a regular basis using the form attached hereto at Tab 2. The NRSC does not currently maintain the originals of such bills. To the best of our knowledge the Santini Committee was not given any other information or materials concerning the matters listed in paragraphs a - f of Question 9.

QUESTION 10

State the most recently know home address and business address of Maryanne E. Preztunik, the NRSC's former Comptroller and Director of Administration.

Request of Documents

Provide copies of all documents pertaining to the responses to interrogatories 8 and 9, including but not limited to, correspondence with contributors (with respect to 8a), internal memoranda, and evidence of communication with the Santini Committee by telephone, written correspondence, face-to-face conversation or any other means.

RESPONSE 10

The most recent home address of Maryanne E. Preztunik known to the NRSC is 540 Ridge, Newark, New Jersey. The NRSC has no business address on file for Ms. Preztunik following her departure from the NRSC.

RESPONSE TO REQUEST FOR DOCUMENTS

Attached at Tab 1 please find copies of the following documents responsive to the request for the production of certain materials related to Question 8, herein:

1. Text of letter of March 17, 1986;
2. Text of letter of September 10, 1986.

The only documents responsive to the request for materials related to Question 9 are the Direct-To Program billing form, attached hereto at Tab 2, the related documents already submitted to the Commission at Attachment 4 of the NRSC's previous Response of September 22, 1987, and the Direct-To Program

Agreement, already submitted to the Commission at
Attachment 3 of the NRSC's Response of September 22,
1987.

The above statements are true to the best of my
knowledge and belief.

Jana M. Beaumont
Name

Campaign Finance Assistant
Title

)
) DISTRICT OF COLUMBIA
)

Subscribed to and sworn before me this 22 day of May,
1989.

Lana C. Guiler
Notary Public

My Commission Expires: July 14, 1992